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July 30, 2025

Via ECF

The Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, New York 10007

Re: The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al; Case No. 24-cv-07509 (DLC)

Dear Judge Cote:

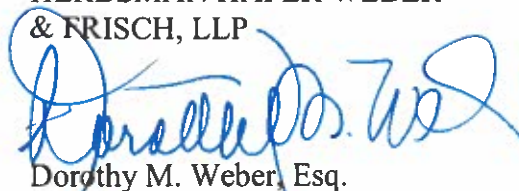
Pursuant to Section 1D of your Honor's Individual Rules & Practices in Civil Cases, the Plaintiffs respectfully submit this letter-motion to request an extension of time for Plaintiffs to answer Rodney Oliver's filing entitled "Motion for Declaratory Relief, Protective Order, and Sanctions" (Dkts. 144, 145). Plaintiffs need guidance on whether such filings are being treated as motions, and if so, the due date for an opposition by Plaintiffs is on August 8, 2025. If that is the case, Plaintiffs request an extension to August 21, 2025 or to a date as otherwise determined by the Court.

The requested extension is made in good faith and it does not impact the Court-ordered reply to Defendants' Opposition to our Motion for Sanctions which is currently due to be filed by August 15, 2025 (Dkt. 142).

Defendants did not respond to our request for an extension of time. There has been no previous request for an extension of time in connection with this matter.

Respectfully submitted,

HERBSMAN HAFER WEBER
& FRISCH, LLP



Dorothy M. Weber, Esq.

DMW/rr